

EXHIBIT A

Custodian	Included on ESI Order 176	Plaintiffs Proposal
Alejandro, Juan	Yes PH	Previously agreed custodians-- JD 11-15 and AA 12-18 run for entire ESI time period. JD 1-15 and AA 1-18 plus search terms for 6/15/16 - 11/7/17.
Beckenhauer, Charlie	Yes PH	
Bennett, Phil	Yes PH	
Blount, Norris	Yes PH	
Bradshaw, Paul	Yes PH	
Briles, Art	Yes PH	
Briles, Kendal	Yes PH	
Childers, Mark	Yes PH	
Counsellor, Jeremy	Yes PH	
Crawford, Patty	Yes PH	
Davis, Tommye Lou	Yes PH	
Deats, Shelly	Yes PH	
Doak, Jim	Yes PH	
Dorrell-Ritter, Sarah	Yes PH	
Genous, Lori	Yes PH	
Gochis, Cheryl	Yes PH	
Hogue, Tiffany	Yes PH	
Holmes, Chris	Yes PH	
Jackson, Chad	Yes PH	
Jackson, Kevin	Yes PH	
Jobson, Marci	Yes PH	
Jobson, Paul	Yes PH	
Knowles, Kandy	Yes PH	
Kzadi, Kaz	Yes PH	
Leeper, Karla	Yes PH	
Lyons, Gabrielle	Yes PH	
MacLemore, Don	Yes PH	
McCaw, Ian	Yes PH	
McCraw, Bethany	Yes PH	
McRary, Ian	Yes PH	
Miller, Keith	Yes PH	
Murdock, David	Yes PH	
Nicholson, Brian	Yes PH	
Patulski, Todd	Yes PH	
Post, Nancy	Yes PH	
Ramsower, Reagan	Yes PH	
Rogers, Mike	Yes PH	
Schillinglaw, Colin	Yes PH	
Scott, Martha Lou	Yes PH	
Starr, Ken	Yes PH	
Toben, Brad	Yes PH	
Walls, Candice	Yes PH	
Walter, Janelle	Yes PH	
Whelan, John	Yes PH	

Wigtil, Brad	Yes PH	
Yeary, Wes	Yes PH	
Cano, Elisabeth	yes	
Clements, Randy	yes	
Cooper, Trenia	yes	
Fogleman, Lori	Yes	
Garland, David	yes	
Garner, Brian	yes	
Holgersson, Migdalia	yes	
Ivy, Becky	yes	
Jarrell, Sarah	yes	
Jarvis, Jennifer	yes	
Lebby, Jeff	yes	
McGregor, F.B. (Bob)	yes	
McPherson, Sarah	yes	
Noble, Michael	yes	
Priest, Pattilin	yes	
Splane, Sonya	yes	
Torres-Smith, Katherine	yes	
Trevathan, Edwin	yes	
Tucker, Kristen	yes	
Wall, Cynthia	yes	
Barry, John	not agreed	Entire ESI time period and all terms.
Brooks, David	not agreed	Entire ESI time period and all terms.
Brumley, Larry	not agreed	Entire ESI time period and all terms.
Crone, Marilyn	not agreed	Entire ESI time period and all terms.
Davis, Elizabeth	not agreed	Entire ESI time period and all terms.
Davis, Molly	not agreed	Entire ESI time period and all terms.
Frost, Melvin	not agreed	Entire ESI time period and all terms.
Gaynor, Kim	not agreed	Entire ESI time period and all terms.
Gray, Cary	not agreed	Entire ESI time period and all terms.
Gray, Van	not agreed	Entire ESI time period and all terms.
Haag, Jerry	not agreed	Entire ESI time period and all terms.
Hall, Ken	not agreed	Entire ESI time period and all terms.
		Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Hall, Yoshiko	not agreed	
Harper, David	not agreed	Entire ESI time period and all terms.
Helpert, Kevin	not agreed	Entire ESI time period and all terms.
Howell, Brent	not agreed	Entire ESI time period and all terms.
Hulme Eileen	not agreed	Entire ESI time period and all terms.
James, Lee Ann	not agreed	Entire ESI time period and all terms.
Jeffrey, David	not agreed	Entire ESI time period and all terms.

Jones, Greg	not agreed	Entire ESI time period and all terms.
Jones, Neal T	not agreed	Entire ESI time period and all terms.
Kamperman, Carrolle	not agreed	Entire ESI time period and all terms.
Kroll, Sydney	not agreed	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Kucera, Jeannette	not agreed	Entire ESI time period and all terms.
Lilley, John M.	not agreed	Entire ESI time period and all terms.
Lofgren, Randy	not agreed	Entire ESI time period and all terms.
Maggard, Judy	not agreed	Entire ESI time period and all terms.
Marsh, James	not agreed	Entire ESI time period and all terms.
Morrison, Michael D.	not agreed	Entire ESI time period and all terms.
Mosser, Ali	not agreed	Entire ESI time period and all terms.
Murff, Ronald	not agreed	Entire ESI time period and all terms.
O'Brien, Randall	not agreed	Entire ESI time period and all terms.
Oliver, Dub	not agreed	Entire ESI time period and all terms.
Orr, Pattie	not agreed	Entire ESI time period and all terms.
Prescott, Dennis	not agreed	Entire ESI time period and all terms.
Robertson, Tyler	not agreed	Entire ESI time period and all terms.
Rogers, Lauri	not agreed	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Scott, Richard C.	not agreed	Entire ESI time period and all terms.
Sloan, Robert	not agreed	Entire ESI time period and all terms.
Stern, Sharon	not agreed	Entire ESI time period and all terms.
Stone, Dary	not agreed	Entire ESI time period and all terms.
Ternus, Marsha	not agreed	Entire ESI time period and all terms.
Thompson, Amber	not agreed	Entire ESI time period and all terms.
Underwood, Bill	not agreed	Entire ESI time period and all terms.
Welch, Doug	not agreed	Entire ESI time period and all terms.
Willis, Richard	not agreed	Entire ESI time period and all terms.
Wooten, Cheryl	not agreed	Entire ESI time period and all terms.
Wright, Kathy Wills	not agreed	Entire ESI time period and all terms.

Barnes, Ashley	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Benninghof, James	NA	Entire ESI time period and all terms.
Binetti, Katie Marie	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Bracey, Amanda Thogmartin	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Bradshaw, John Mattison	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Bradshaw, Ronald	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Burchett, Matt	NA	Entire ESI time period and all terms.
Castleberry, Vanessa	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.

Corey, David	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Diaz-Grandados, Jamie	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Dolan, Sara	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Evans, Katherine Reed	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Flores, Adam	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Fulcher, Alexandria	NA	Entire ESI time period and all terms.
Garner, Brian	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Garrett, Lisa	NA	Entire ESI time period and all terms.
Gilbreath, Brianna	NA	Entire ESI time period and all terms.

Gipson, Stephen Lloyd	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Goodman, Amy	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Graham, Curtis	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Gravagne, Ian	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Greer, Stanton	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Grobe, Jim	NA	Entire ESI time period and all terms.
Hicks, Brandyn	NA	Entire ESI time period and all terms.
Hinojosa, Victor	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Hughes, Carolyn	NA	Entire ESI time period and all terms.

Jordan, William	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Lanning, Beth	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Livingstone, Linda	NA	Entire ESI time period and all terms.
MacMaster, Lisa	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Makowsky, Dan Reid	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Manzanares, Carlos	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Marsh, Monique	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.

Mastin, Regina	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
McKinney, Marilyn	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Moore, Colby	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Nam, Kyunglim	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Oxford, Ed	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Rabbe , Dennis Henry	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.

Riley, Hugh H.	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Rushing, Anne Elizabeth	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Sadler , Larry	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Shuford, Kevin Lee	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Skurla, Carolyn	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Stewart, Phil	NA	Entire ESI time period and all terms.
Tsang, JoAnn	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.

Uber, David Merrill	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Usenko, Crystal	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
White, Ellen	NA	Entire ESI time period and all terms.
Wood, Emma	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.
Wright, Lesley	NA	Limit search to all JD & AA names and documents regarding policies, procedures and programs related to sexual assault and Title IX. Search for the Entire ESI time period and for the Jane Doe's still enrolled past 11/6/17, through the date of graduation.

Original ESI & Additional ESI Orders - Terms	Plaintiffs Proposal
PH	Agree to PH NOT w/1 D
bury	Agree to Remove
delete* (but used in conjunction with report or evidence)	Agree to Remove
failure /s identify	Agree to Remove
failure /s prioritize	Agree to Remove
Galluccie	Agree to Remove
Harrassment	Agree to Remove
Hidding	Agree to Remove
multiple /s partner	Agree to Remove
penetration	Agree to Remove
prior /s conduct	Agree to Remove
purge*	Agree to Remove
prior /s sex	Include- Not Agreed
resource /s title ix	Include- Not Agreed
Sex / Sexual	Include- Not Agreed
Sex Act	Include- Not Agreed
Sexual Activity	Include- Not Agreed
Violence Against Women Reauthorization Act / VAWA	Include- Not Agreed
Assault*	Include- Not Agreed
Clery Act	Include- Not Agreed
Sexual Assault	Include- Not Agreed
Title IX	Include- Not Agreed
stalk*	Include- Not Agreed
failure /s action	Include - Agreed
failure /s implement	Include - Agreed
failure /s respond	Include - Agreed
redact /s name	Include - Agreed
Jane Does 1-15 & Alleged Assailants 1-18	Include - Agreed
deserved /s it	Include - Agreed
disciplinary /s sex	Include - Agreed
expel*	Include - Agreed
her /s dress	Include - Agreed
her /s fault	Include - Agreed
ho	Include - Agreed
immoral	Include - Agreed
inbreed	Include - Agreed
Intimate Partner Violence	Include - Agreed
Mea Culpa	Include - Agreed
pattern /s conduct	Include - Agreed
pattern /s violence	Include - Agreed
pervert	Include - Agreed
premarital	Include - Agreed
preservation /s evidence	Include - Agreed

promiscuous	Include - Agreed
rape	Include - Agreed
she /s dress	Include - Agreed
she /s expect	Include - Agreed
Skank*	Include - Agreed
Sleazy	Include - Agreed
slut*	Include - Agreed
stripper	Include - Agreed
title ix /s compliance	Include - Agreed
tramp	Include - Agreed
whore	Include - Agreed
asking /s for /s it (used in conjunction with they or she	Include - Agreed
consent* /s sex	Include - Agreed
dating /s violence	Include - Agreed
dear colleague letter with reference to sex	Include - Agreed
Gender /s Harrassment	Include - Agreed
hostile environment	Include - Agreed
Incapacitated (but used in conjunction with alcohol, beer or drink	Include - Agreed
insidious	Include - Agreed
Non-consensual	Include - Agreed
Pepper	Include - Agreed
Pepper Hamilton	Include - Agreed
P-H	Include - Agreed
response /s Title IX	Include - Agreed
Sexual Contact	Include - Agreed
Sexual Exploitation	Include - Agreed
Sexual Harrassment	Include - Agreed
she /s wearing	Include - Agreed
victim blaming	Include - Agreed
<u>New terms proposed by Baylor</u>	
sexual assault /s task force	Plaintiffs agree to the additional terms
implement* /s recommendations	
Pepper Hamilton /s recommendations	
incapacitated /s alcohol s/ beer /s drink	
105 Recommendations	
implement* /s pepper hamilton	
implement* /s recommendation*	
sexual assault /s action team	
sexual assault /s implement*	